BNG strategy and statement

This Biodiversity Net Gain Strategy outlines how the proposed development will achieve the specified minimum net gain in biodiversity. It has been prepared to meet both local requirements and the national BNG framework. The site is a small development, qualifying for use of the Small Sites Metric (SSM) under Natural England guidance. This strategy is supported by a completed **Biodiversity Metric** calculation, **Habitat Plans** illustrating pre- and post-development habitats, and a draft **Biodiversity Gain Plan**. These documents demonstrate in detail how the development will deliver at least a 10% increase in on-site biodiversity value, per the Environment Act 2021 requirements.[1]

Summary and statement

The applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition. It is noted that exemptions, even if applicable, are not mandatory to take and that the NPPF encourages all planning applications to secure a measurable increase in BNG.

The proposed development looks to *enhance* and *create* habitats on-site to offset any losses, so far as possible, at all stages following the mitigation and BNG hierarchies. All net gain units are delivered on the application site **– no off-site units** are required, and no surplus units will be generated for sale**.** This document should be read in conjunction with the Biodiversity Metric, habitat plans (both pre- and post-development) and draft Biodiversity Gain Plan for the application. These documents comply with the statutory requirements in legislation and constitute the definitive statement of the site's biodiversity value before development and its intended post-development value.

The strategy has been prepared by a suitably competent person, as permitted for small sites under current guidance, ensuring a transparent, measurable net gain that complements local conservation priorities and greenspace needs. The Local Planning Authority (LPA) is invited to review this strategy and accompanying metric with the understanding that it demonstrates full compliance with both national guidance and local requirements for Biodiversity Net Gain.

Summary of BNG Strategy

Has the mitigation hierarchy been followed?	YES (see below for more details)
Have BNG Metric Principles and Good Practice Principles been followed?	YES (see below for more details)
Are there any habitats rated above "moderate" distinctiveness on site?	NO
Are off-site units being used in this application?	NO

[1] NB while this statement will refer to 10% to satisfy the requirements of the Environment Act 2021, the applicant is happy to confirm in writing, as a supplement to this statement, that a higher percentage may be applicable to accommodate local requirements.

Will any units be dedicated to other developments?	NO
Pre-development and post-development biodiversity value of the on-site habitat	Please see the attached draft Biodiversity Gain Plan
Publication date of the metric	1 July 2024
Degradation on site?	No

How the mitigation hierarchy has been followed

The applicant has rigorously applied the **mitigation hierarchy** (avoid → minimise → remediate/compensate) to biodiversity impacts.

Avoidance: The site layout and design have, as far as possible, been shaped to **avoid** harm to existing biodiversity. There are no significant habitats (i.e. habitats rated above "moderate" distinctiveness) on site, and there are no designated or priority habitats on site. In addition, consideration was given to whether habitat features (e.g. mature trees, hedgerows, or higher-distinctiveness areas) could be retained *in situ* - though it is acknowledged that, for these less distinct habitats, it is not always possible to avoid negative impacts.

Minimisation: Where impacts could not be completely avoided, measures have been taken to **minimise** them. This includes taking such steps as are appropriate during construction to reduce negative impacts to on-site habitats, and ensuring legal requirements to have regard for the sensitive timing of works to avoid disturbance to wildlife (e.g. avoiding bird nesting season for vegetation clearance) are respected as well as implementing pollution prevention controls to protect adjacent habitats (again as set out in legislation). These steps reduce the magnitude of any unavoidable damage.

Remediation/Compensation: Any residual losses of habitat will be **compensated** through on-site habitat creation and enhancement to achieve a net gain. The compensatory measures are proportionate to the biodiversity losses and are designed to exceed mere replacement by providing an uplift in habitat value of at least the specified amount. The specific habitat creation proposals (detailed in the sections below and shown on the Habitat Plans) will more than offset the small areas of habitat unavoidably lost to the development.

Adherence to BNG Metric Principles and Good Practice Principles

This was followed by using the Joe's Blooms Biodiversity Net Gain Tool, which builds the BNG metric principles and good practice principles into its user journey. The BNG assessment and design adhere to

the **Defra Metric principles** as well as the accepted **Good Practice Principles for Biodiversity Net Gain.** Key ways in which these principles have been followed include:

- **Use of an Accepted Metric & Transparency:** The Defra Small Sites Metric has been used to quantify biodiversity changes, as required. The metric output provides a transparent, evidence-based calculation of baseline and post-development biodiversity units. All inputs (habitat types, areas, distinctiveness, etc.) are supported by ecological survey data and rationale. We have followed the metric *"rules"* and guidelines closely – for example, the **trading rules** have been respected so that no **"trading down"** of habitat value occurs (losses of any higher distinctiveness habitat would be compensated with *like-for-like or better* habitat units). The metric confirms that the development achieves at least **the required net gain for each relevant habitat category**, in line with national rules that the 10% gain applies to area habitats (and hedgerow units, if present) separately.
- **Good Practice Principles:** The project has been developed in line with the industry's **ten Good Practice Principles for BNG** (CIRIA/CIEEM/IEMA, 2016). In summary, the development:
    - **Achieves genuine Net Gain** – leaving biodiversity in a better state than before by delivering an overall increase in biodiversity units on-site
    - **Prioritses avoidance of harm** (Principle 1) as described above, ensuring BNG is not a substitute for preventing impacts in the first place
    - **Avoids losing biodiversity that cannot be offset** (Principle 2) – no irreplaceable habitats are affected, and higher value features are retained.
    - **Inclusive and equitable** (Principle 3) – the BNG design supports wider community objectives by improving local greenspace quality.
    - **Addresses risk and sustainability** (Principles 4 and 9) – the proposed habitats have been selected and designed with a high likelihood of success and long-term persistence. Only realistic and deliverable habitat creation proposals are put forward, considering the site conditions and management resources (consistent with SSM
    - **Makes a measurable contribution** (Principle 5) – the use of the Defra metric provides a quantified measure of the gain. Baseline and proposed values are documented, ensuring the net outcome is clearly demonstrated in numbers of units.
    - **Achieves the best outcomes for biodiversity** (Principle 6) – the type and location of new habitats are chosen to contribute to local conservation priorities. Wherever feasible, native species and locally appropriate habitat types are used.
    - **Is additional and will create a legacy** (Principles 7 and 8) – the gains are **additional** to what would have happened anyway. All proposed habitat enhancements are above and beyond any existing legal or policy requirements. There is no double-counting of any measures that are already required for mitigation; the net gain is truly extra and will be retained for a minimum of 30 years.
    - **Transparency** (Principle 10) – this strategy and the accompanying metric openly present the methods, data, and results of the BNG calculation.

In adhering to both the metric's technical principles and the broader good practice ethos, the project ensures that the planned biodiversity gains are robust, credible, and in line with industry standards.

Adherence to the Biodiversity Net Gain Hierarchy

The Biodiversity Net Gain hierarchy has been followed in developing this strategy. This was followed by using the Joe's Blooms Biodiversity Net Gain Tool, which builds the hierarchy into its user journey. This hierarchy dictates a preference order for achieving net gain: on-site measures are prioritised first, followed by off-site measures if necessary, with statutory biodiversity credits as a last resort. In this case, the development is able to meet its BNG obligation entirely on-site, which is the optimal outcome.

Every opportunity has been taken to deliver the required habitat enhancements within the application site itself. The design includes on-site creation of new habitats and enhancement of existing ones to generate the needed biodiversity units. Examples of on-site BNG measures are: converting areas of species-poor grassland into species-rich wildflower meadow, planting new native hedgerows along site boundaries, enhancing an existing garden lawn into a more biodiverse orchard or wildflower area, and installing features like log piles or ponds to increase habitat diversity. These on-site actions collectively yield a net gain in excess of 10% as calculated by the SSM. By maximising on-site gains, the proposal aligns with the strong preference for on-site delivery in the BNG hierarchy.

This approach should give the LPA confidence that the applicant has explored all on-site options to deliver net gain locally, which is typically the most desirable outcome from both ecological and planning perspectives.

On-Site Habitat Creation & Greenspace Considerations

The proposed on-site habitat creation and enhancement measures have been carefully designed to be **appropriate for the site** and compatible with other **greenspace requirements** of the development. The aim is to deliver biodiversity net gain *without compromising* the functional and amenity needs of the site's open spaces.

The development's landscape plan shows how the on-site gains have been designed so as to integrate biodiversity features into the scheme. Key elements of maximising this include using **native planting wherever possible, in line with Natural England's criteria for achieving "good" condition.** Wherever existing vegetated areas or trees are retained, they will be enhanced through management (e.g. relaxing mowing regimes on retained grass)

In addition, BNG measures have been selected with regard to greenspace functionality. All habitat creation has been planned so that it complements the site's usable open space and landscaping needs. In other words, all habitat creation has been planned so that it complements the site's **usable open space** and landscaping needs. The BNG features are, as far as is possible, **multi-functional**, meaning they aim to provide ecological value *and* benefit people.

Given the small size of the development, habitat proposals are scaled to fit within the site without overwhelming it. We have avoided proposing habitats that would be inappropriate or unsustainable in a small site context.

Need for off-site units

There are no off-site units being used in this development.

Proposals for any excess of onsite biodiversity units

There is no intention to make excess units available to other developments.

Local Requirements

Throughout this development, due regard and best endeavours were given to any local authority requirements. In particular, regard was given to the summary of LPA requirements for, *inter alia,* any local requirements relating to strategic significance; “significance”; local wildlife strategies (such as wildlife corridors). It is noted that, due to the small size of the site and the limited nature of the small sites metric and UKHAB framework, it is not always possible to align with local strategies fully. Still, it is believed that the proposed approach is a proportionate attempt to accommodate local requirements.

Conclusion

In conclusion, this Biodiversity Net Gain Strategy demonstrates how the proposed small development will achieve and exceed the required net gain in biodiversity, in full compliance with both national legislation and local validation requirements. The strategy follows the mitigation hierarchy to avoid and minimise harm, adheres to Defra’s metric principles and industry good practice, applies the BNG hierarchy by delivering gains on-site, ensures habitat proposals are appropriate alongside other greenspace needs, and clearly states that no off-site or tradeable units are involved.

The approach taken is both proportionate and robust. Being a small site, the use of the Small Sites Metric and the appointment of a suitable competent person to prepare this document are in line with Natural England’s guidance. The competency of the author and the evidence base for the metric are documented in the Annexes and the metric workbook, respectively, to give the LPA confidence in the results. All habitat enhancements proposed are realistic and will be secured for at least 30 years, ensuring a long-term positive outcome for biodiversity. Further information can be provided upon request.

Annex One: Notes on the Competency of the Competent Person

This Biodiversity Net Gain assessment and strategy have been prepared by someone who meets the criteria of a “**competent person**” for the Small Sites Metric (SSM) analysis on behalf of the applicant. The following statement sets out the competency of the author in accordance with the relevant guidance. As per Natural England’s SSM User Guide, *“The developer is responsible for selecting the*

competent person for completing the SSM. The competent person does not need to be an ecologist for the SSM. The Local Planning Authority does not need to verify the competent person."

Although a formal ecology license or chartership is not mandatory for SSM, this strategy has been prepared with rigor. The habitat survey data used in the metric was either gathered by the competent person or drawn from reputable sources - including use of the Joe's Blooms Biodiversity Net Gain Tool to determine the appropriate UKHAB habitat designations.

As this is a small site, the competent person has the appropriate expertise to have produced this BNG Strategy. This annex is provided to give the LPA assurance that the requirements of a "suitably qualified or experienced person" are met, as per Natural England's definition for small sites. Should the LPA have any further queries regarding competency, the author is prepared to provide a statement of competency upon request.

Annex Two: On-site habitats (baseline and post-development)

Please see the attached Biodiversity metric and draft Biodiversity Gain Plan